

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS**

LIONRA TECHNOLOGIES LTD.,

Plaintiff,

v.

MOTOROLA MOBILITY LLC,

Defendant.

Case No. 1:22-cv-2231

Hon. Andrea R. Wood

STIPULATION FOR EXTENSION OF TIME

Plaintiff Lionra Technologies Limited and Defendant Motorola Mobility LLC, by their undersigned counsel and pursuant to Federal Rule of Civil Procedure 6, respectfully request that the Court extend Defendant's deadline to respond to the Complaint through July 11, 2022. In support, the parties state:

1. Plaintiff filed the Complaint on April 28, 2022. ECF No. 1.
2. Motorola Mobility LLC was served with a copy of the Complaint on May 5, 2022, and pursuant to the Federal Rules must respond to the Complaint on or before May 26, 2022.
3. The parties' counsel met and conferred on May 17, 2022 and May 18, 2022. Counsel for Defendant requested additional time to respond to the Complaint. Based on that discussion, the parties agree and stipulate, subject to this Court's approval, that Defendant's time to respond should be extended by 45 days, which by virtue of Rule 6(a)(1)(C) would establish July 11, 2022, as the deadline for Defendant to respond to the Complaint.
4. This is the *first* request for any extension of time in this matter.

5. The parties seek the relief set forth herein for good cause and in the interest of efficiency, not for the purposes of delaying the proceedings.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court extend each Defendant's deadline to respond to the Complaint through July 11, 2022.

Dated: May 26, 2022

/s/ Marc A. Fenster

Reza Mirzae

CA State Bar No. 246953

Marc A. Fenster

CA State Bar No. 181067

Neil A. Rubin

CA State Bar No. 250761

RUSS AUGUST & KABAT 12424

Wilshire Boulevard, 12th Floor

Los Angeles, CA 90025

Telephone: 310-826-7474

Email: mfenster@raklaw.com

Email: rmirzaie@raklaw.com

Email: nrubin@raklaw.com

Attorneys for Plaintiff

Lionra Technologies Limited

Respectfully submitted,

/s/ Ferlillia V. Roberson

Ferlillia Roberson

(ferlillia.roberson@us.dlapiper.com)

DLA Piper LLP (US)

444 West Lake Street, Suite 900

Chicago, Illinois 60606

T: 312.368.4000

Attorney for Defendant

Motorola Mobility LLC